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May 28, 2020

VIA ECF

The Honorable James Orenstein
United States Magistrate Judge
Eastern District of New York
Courtroom 11D South
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Avelar v. Ciampa Management Corp., et al. 20-CV-210-AMD-JO (E.D.N.Y.)**

Dear Judge Orenstein:

This Firm represents the defendants Ciampa Management Corp., Douglas A. Ciampa and Victor Hidalgo (collectively, “Defendants”) in the above-referenced action. This is a joint letter with Nolan Klein, Esq., counsel for the plaintiff Luis Avelar (“Plaintiff”), further to the parties’ joint request for an extension of time in which to submit a proposed notice to potential opt-in plaintiffs.

We write to advise the Court that the parties are willing to stipulate that during the period of the adjournment, the limitations period is tolled for potential opt-in plaintiffs.

Respectfully submitted,
PHILLIPS NIZER LLP
/s/ Laura E. Longobardi
Laura E. Longobardi

LEL:

cc: Nolan Klein, Esq. (via ECF)